

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION (Youngstown)**

<b>IN RE:</b>	)	<b>CHAPTER 7</b>
	)	
<b>AIMEE MARIE THOUVENIN</b>	)	<b>CASE NO. 15-42069</b>
	)	
<b>Debtor</b>	)	<b>JUDGE KAY WOODS</b>

**MOTION FOR EXTENSION OF TIME TO OBJECT TO DEBTOR'S  
DISCHARGE OR CHALLENGE THE DISCHARGEABILITY OF CERTAIN DEBTS**

Creditor, The Charter Oak Fire Insurance Company (“Charter Oak”), through counsel and pursuant to Rule 4007 and Rule 9006 respectfully requests a thirty-day extension of time, from today’s date, in which to object to debtor’s discharge or challenge the dischargeability of certain debts. Good cause exists in that Charter Oak needs additional time to determine whether or not it wishes to file such objections. Furthermore, additional pertinent information from the debtor may be forthcoming as evidenced by the continuation of the most recent 341(a) Meeting of Creditors on February 23, 2016. Charter Oak acknowledges that this motion is being made two days beyond the original deadline of February 22, 2016, and respectfully submits that, in the process of participating in the 341(a) Meetings and attending to other aspects of this case, counsel inadvertently overlooked the February 22, 2016 deadline. A proposed order granting Charter Oak’s motion is being submitted for the Court’s consideration.

Respectfully submitted,

/s/Melanie R. Irvin

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***Attorney for Creditor The Charter Oak Fire  
Insurance Company***

**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2016, a copy of the foregoing *Motion for Extension of Time* was served as follows:

**Electronically:**

Dean D. Paolucci, *Attorney for Debtor*  
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Andrew W. Suhar, *Trustee*  
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**U.S. Postal Service, First Class, Postage Prepaid:**

Aimee Thouvenin, **Debtor**  
1627 Merle Rd.  
Salem, OH 44460

Respectfully submitted,

/s/Melanie R. Irvin

**SCOTT A. NORCROSS (0073407)**

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***Attorney for Creditor The Charter Oak Fire  
Insurance Company***